

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

GOVERNMENT OF THE UNITED)
STATES VIRGIN ISLANDS)

Plaintiff,)

v.)

JPMORGAN CHASE BANK, N.A.)

Defendant/Third-Party Plaintiff.)

Case Number: 1:22-cv-10904-JSR

JPMORGAN CHASE BANK, N.A.)

Third-Party Plaintiff,)

v.)

JAMES EDWARD STALEY)

Third-Party Defendant.)

**DECLARATION OF MIMI LIU IN SUPPORT OF
GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS’
MOTION FOR PARTIAL SUMMARY JUDGMENT**

Pursuant to 28 U.S.C. § 1746, I, Mimi Liu, declare under penalty of perjury as follows:

1. I am a member in good standing of the bars of the State of New York and the District of Columbia. I am one of the attorneys representing the Government of the United States Virgin Islands in the above-captioned action and have been admitted to this Court pro hac vice. I am a Member of the law firm of Motley Rice LLC, 401 9th Street NW, Suite 630, Washington, DC 20004. I am familiar with the facts set forth herein and if called as a witness, I could and would competently testify thereto. I submit this declaration and the attached Exhibits in support of the United States Virgin Islands’ Motion for Partial Summary Judgment.

2. Attached hereto are true and correct copies of the following:

| Exhibit Number | Description |
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| Exhibit 1 | Article by Kevin Breuninger, et al., <i>JPMorgan Prepared to Pay \$290 Million in Settlement with Jeffrey Epstein Victims</i> , CNBC (June 12, 2023), https://www.cnbc.com/2023/06/12/jpmorgan-reaches-settlement-with-epstein-victim-in-lawsuit.html . |
| Exhibit 2 | Document at Bates JPM-SDNYLIT-W-00018180-00018196 produced by JPMorgan in this Action and marked as Cutler Exhibit 38 at deposition. Designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 3 | Document at Bates JPM-SDNYLIT-W-00002185-00002196 produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 4 | Document at Bates JPM-SDNYLIT-00184442-00184461, JPM-SDNYLIT-00184460-00184461 (excerpts) produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 5 | August 10, 2019, email, Bates JPM-SDNYLIT-00154364 produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 6 | Article by William K. Rashbaum, Benjamin Weiser, & Michael Gold, <i>Jeffrey Epstein Dead in Suicide at Jail, Spurring Inquiries</i> , N.Y. Times (Aug. 10, 2019) https://www.nytimes.com/2019/08/10/nyregion/jeffrey-epstein-suicide.html . |
| Exhibit 7 | Document, "Risk Level & Designation Determination," New York State Division of Criminal Justice Services, https://www.criminaljustice.ny.gov/nsor/risk_levels.htm#:~:text=Level%203%200(high%20risk%20of,threat%20to%20public%20safety%20exists) . |
| Exhibit 8 | Document at Bates EVCP00000006 produced by nonparty Epstein Victims Compensation Program ("EVCP") in this Action, designated Confidential by the EVCP pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 9 | Excerpt of Expert Report of Bridgette Carr, June 16, 2023. Designated Confidential pursuant to the Protective Order in this matter and filed under seal. |

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| Exhibit 10 | Document at Bates LN_000001-000024 produced by a nonparty in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 11 | Document at JDoe_DBAG_010034-010044 produced by a nonparty in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 12 | Document at JDoe_DBAG_010023-010032 produced by a nonparty in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 13 | Document at Bates JDoe_JPMC_007438-007448 produced by Plaintiff Doe in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 14 | Document at Bates JDoe_JPMC_007449-007464 produced by Plaintiff Doe in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 15 | Document at Bates LC 000456-000476 produced by a nonparty in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 16 | Creditor's Claim on behalf of Jane Doe 981: <i>In the Matter of the Estate of Jeffrey Epstein</i> , Superior Court of the Virgin Islands, March 12, 2020. |
| Exhibit 17 | Creditor's Claim on behalf of [REDACTED] <i>In the Matter of the Estate of Jeffrey Epstein</i> , Superior Court of the Virgin Islands, November 26, 2019. |
| Exhibit 18 | Complaint, <i>Jane Doe No. 2 v. Epstein</i> , No. 08-cv-80119 (S.D. Fla. Feb. 6, 2008). |
| Exhibit 19 | Excerpt of Complaint, [REDACTED] <i>v. Epstein</i> , No. 10-cv-81111 (S.D. Fl. Sept. 17, 2010). |
| Exhibit 20 | Complaint and Demand for Jury Trial, <i>Jane Doe No. 102 v. Epstein</i> , No. 09-cv-80656 (S.D. Fla. May 4, 2009). |
| Exhibit 21 | First Amended Complaint, <i>Jane Doe 43 v. Epstein</i> , No. 17-cv-616 (S.D.N.Y. June 5, 2017). |
| Exhibit 22 | Flight manifests at Bates ESTATE_000454, ESTATE_000464, ESTATE_000466, ESTATE_000474, ESTATE_000500, ESTATE_000536 produced by nonparty The Estate of Jeffrey E. Epstein in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. [Sealed] |

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| Exhibit 23 | Flight manifests at Bates ESTATE_000570-000572 produced by nonparty The Estate of Jeffrey E. Epstein in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 24 | Excerpts of flight manifests at Bates LV_000198, LV_000204-000206, LV-000256-000257 produced by nonparty Larry Visoski in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 25 | Flight manifests at Bates LV_000339-000340, LV_000362-00363, LV_000381-000382, LV_000391-000392, LV_000401-000402 produced by nonparty Larry Visoski in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 26 | Flight manifests at Bates LV_000423-000424, LV_000429-000430, LV_000473-000474, LV_000491-000492 produced by nonparty Larry Visoski in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 27 | Document at Bates JPM-SDNYLIT-W-00038289, JPM-SDNYLIT-W-00038401-00038408 produced by JPMorgan in this Action, designated confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 28 | Excerpts of JPMorgan Chase Bank, N.A.'s Responses and Objections to Third-Party Defendant's (Staley) First Request for Admissions, No. 22-cv-10019-JSR, dated May 22, 2023. |
| Exhibit 29 | Document at Bates JPM-SDNYLIT-00128026-00128033 produced by JPMorgan in this Action, and previously marked as Pearn Exhibit 2 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 30 | Document at Bates JPM-SDNYLIT-00131915-00131916 produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 31 | Due Diligence Report approved on April 14, 2011, Bates JPM-SDNYLIT-00036570-00036578 produced by JPMorgan in this Action, and previously marked as Langford Exhibit 53 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |

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| Exhibit 32 | Transcript excerpts of the Deposition of Mary Casey , taken April 7, 2023, in this Action. JPMorgan has withdrawn its initial designation of Confidential for the testimony contained in these excerpts. |
| Exhibit 33 | Transcript excerpts of the 30(b)(6) Deposition of Senior Advisor, Risk and Compliance, Francis Pearn , taken on March 29, 2023, in this Action. JPMorgan has withdrawn its initial designation of Confidential for the testimony contained in these excerpts. |
| Exhibit 34 | Transcript excerpts of the Deposition of Vice Chairman and Banker, Private Bank, William Marcus Sheridan , taken on July 12, 2023, in this Action. Designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 35 | Transcript excerpts of Deposition of Private Bank Risk Manager, Kevin McCleerey , taken on April 28, 2023, in this Action. JPMorgan has withdrawn its designation of Confidential for the testimony contained in these excerpts. |
| Exhibit 36 | Transcript excerpts of Deposition of former AML Compliance Manager, Maryanne Ryan , taken May 24, 2023, in this Action, designated Confidential in part by JPMorgan pursuant to the Protective Order in this matter and filed under seal in part. [Sealed in part] |
| Exhibit 37 | Due Diligence Report from Aug.-Sept. 2006, Bates JPM-SDNYLIT-00037183-00037205 , produced by JPMorgan in this Action, and previously marked as Casey Exhibit 17 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 38 | Excerpt of Due Diligence Report requested February 22, 2011, Bates JPM-SDNYLIT-00013546, JPM-SDNYLIT-00013551 , produced by JPMorgan in this Action, and previously marked as Langford Exhibit 49 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 39 | Excerpts of JPMorgan Chase Bank, N.A.'s Responses and Objections to Plaintiff Government of the United States Virgin Island's First Request for Admissions, No. 1:22-cv-10904 (JSR) (S.D.N.Y.), dated May 17, 2023. JPMorgan initially designated this document as Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |

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| Exhibit 40 | Article, <i>After long probe, billionaire faces solicitation charge</i> , The Palm Beach Post (July 26, 2006), previously marked as Erdoes Exhibit 9 at deposition in this Action. |
| Exhibit 41 | Probable Cause Affidavit, Palm Beach Police Department, dated May 1, 2006, and previously marked as Langford Exhibit 15 at deposition in this Action. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 42 | July 28, 2006, article from ABC News: The Blotter, <i>Warrants Were Prepared to Arrest Others in Millionaire Sex Scandal</i> , Bates JPM-SDNYLIT-00269657-00269658 , produced by JPMorgan in the Action, designated Confidential by JPMorgan pursuant the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 43 | August 14, 2006, email, Bates JPM-SDNYLIT-00105859 , produced by JPMorgan in this Action, and a <i>New York Post</i> article by Dan Mangan, <i>Mystery Mogul's Teen-Sex Secret Bared in Probe</i> , dated August 14, 2006, http://www.nypost.com/news/regionalnews/mystery_moguls_teen_sex_secret_bared_in_probe_regionalnews_dan_mangan.htm , accessed April 4, 2023, together previously marked as Casey Exhibit 11 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 44 | AML Operations Human Trafficking Overview, Bates JPM-SDNYLIT-00174047-00174061 , dated August 5, 2008, produced by JPMorgan in this Action, and is an excerpt of a document previously marked as Langford Exhibit 14 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation for this portion of Langford Exhibit 14. |
| Exhibit 45 | September 22, 2006, email and attachment, Bates JPM-SDNYLIT-00269393-00269403 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 46 | Transcript excerpts of Deposition of Third-Party Defendant James E. Staley , taken on June 10-11, 2023, in this Action, designated Confidential in part by JPMorgan pursuant to the Protective Order in this matter and filed under seal in part. [Sealed in part] |
| Exhibit 47 | July 26, 2006, email, Bates JPM-SDNYLIT-00099334 , produced by JPMorgan in this Action, and previously marked as Erdoes Exhibit 8 at deposition. |

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| | JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 48 | Excerpts of Third-Party Defendant James E. Staley's Responses and Objections to United States Virgin Islands' First Set of Request for Admissions, dated May 22, 2023. |
| Exhibit 49 | May 21, 2003, email, Bates JPM-SDNYLIT-00137281 , produced by JPMorgan in this Action, and an article by Vicky Ward, <i>The Talented Mr. Epstein</i> , Vanity Fair (March 1, 2003), https://www.vanityfair.com/news/2003/03/jeffrey-epstein-200303 (accessed March 31, 2023), together previously marked as Casey Exhibit 4 at deposition. JPM-SDNYLIT-00137281 is stamped Confidential, but JPMorgan has withdrawn the designation |
| Exhibit 50 | Document at Bates JPM-SDNYLIT-W-00025790 - 00025790_003 , produced by JPMorgan in this Action, and previously marked as Dimon Exhibit 125 at deposition. Designated Confidential by JPMorgan pursuant the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 51 | Document at Bates JPM-SDNYLIT-W-00025792 – 00025792_003 , produced by JPMorgan in this Action, and previously marked as Dimon Exhibit 126 at deposition. Designated Confidential by JPMorgan pursuant the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 52 | Document at JPM-SDNYLIT-W-00025791 – 00025791_003 , produced by JPMorgan in this Action, and previously marked as Dimon Exhibit 127 at deposition. Designated Confidential by JPMorgan pursuant the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 53 | Presentation, "Human Trafficking," Bates JPM-SDNYLIT-00151917-00151921 , produced by JPMorgan in this Action, and previously marked as Pearn Exhibit 8 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 54 | Document at Bates JPM-SDNYLIT-00174386-00174391 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 55 | Document at Bates JPM-SDNYLIT-W-00037475-00037476 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant the Protective Order in this matter and filed under seal. [Sealed] |

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| Exhibit 56 | Expert Report of Jorge Amador, June 16, 2023. Designated Confidential pursuant to the Protective Order in this matter and filed under seal. |
| Exhibit 57 | Index of account statements for Epstein's JPMorgan account ending in 0438, produced by JPMorgan in this Action.* |
| Exhibit 58 | Index of account statements for Epstein's JPMorgan account ending in 1001, produced by JPMorgan in this Action.* |
| Exhibit 59 | Index of account statements for Financial Trust's JPMorgan account ending in 0001, produced by JPMorgan in this Action.* |
| Exhibit 60 | Index of account statements for Financial Trust's JPMorgan account ending in 5001, produced by JPMorgan in this Action.* |
| Exhibit 61 | February 8, 2006, email, Bates JPM-SDNYLIT-00449033 , produced by JPMorgan in this action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 62 | Excerpts of JPMorgan Chase Bank, N.A.'s Responses and Objections to Plaintiff Doe's First Request for Admissions, Case No. 1:22-cv-10019, dated March 23, 2023. |
| Exhibit 63 | Oct. 19-23, 2007, email thread with multiple attachments, Bates JPM-SDNYLIT-00269651-00269660 , produced by JPMorgan in this Action, and previously marked as Cutler Exhibit 8 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 64 | Account summary for account ending in 2810, Bates JPM-SDNYLIT-00091213 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 65 | Document at Bates JPM-SDNYLIT-00104316-00104317 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |

*For all account statements, the Government is producing an index rather than attaching these documents because they are voluminous (thousands of pages). The Government's SUF includes tables summarizing relevant information from the account statements. The Government will provide these documents to the Court at its request.

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| Exhibit 66 | January 14, 2011, email and attachment, Bates JPM-SDNYLIT-00152804-00152806 , produced by JPMorgan, and previously marked as Ryan Exhibit 34 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 67 | Document at Bates JPM-SDNYLIT-00149696-00149700 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 68 | February 9, 2004, Due Diligence Report, Bates JPM-SDNYLIT-00036564-00036569 , produced by JPMorgan in this Action, and previously marked as Erdoes Exhibit 6 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 69 | Document at Bates SDNYLIT-W-00041545-00041550 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 70 | January 10, 2011, email, Bates JPM-SDNYLIT-00152748_R , produced by JPMorgan in this Action, and previously marked as Cutler Exhibit 28 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 71 | Document entitled, "Human Trafficking Finance: Nature, Scope and Control Project," November 2010. Bates JPM-SDNYLIT-00173973-00173992 , produced by JPMorgan in this Action, and previously marked as Casey Exhibit 38 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 72 | John Carney, <i>Meet [REDACTED] Star Girl of the Raunchiest Part of Epstein Scandal</i> , Dealbreaker (July 28, 2006), https://dealbreaker.com/2006/07/meet-[REDACTED]-star-girl-of-the-raunchiest-part-of-epstein-scandal , accessed July 1, 2023. |
| Exhibit 73 | March 8, 2007, email and attachment, Bates JPM-SDNYLIT-00001494-00001496 , produced by JPMorgan in this Action and previously marked as Casey Exhibit 15. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |

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| Exhibit 74 | June 9, 2010, email, Bates JPM-SDNYLIT-00008237-00008240 , produced by JPMorgan in this action, and previously marked as Casey Exhibit 35 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation while retaining its original redactions to the document. |
| Exhibit 75 | Document at Bates JPM-SDNYLIT-00026318 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 76 | Oct. 17, 2006 Rapid Response Team memorandum, Bates JPM-SDNYLIT-00127953 , produced by JPMorgan in this Action, and previously marked as Erdoes Exhibit 3 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 77 | Transcript excerpts of the Deposition of Risk Manager, Bonnie Perry , taken May 10, 2023, in this Action, designated Confidential in part by JPMorgan pursuant to the Protective Order in this matter and filed under seal in part. [Sealed in part] |
| Exhibit 78 | Document at Bates JPM-SDNYLIT-W-00021995-00021996 , produced by JPMorgan in this Action, and previously marked as DeLuca Exhibit 29 at deposition. Designated Confidential pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 79 | Currency Transaction Reports, produced by third-party the Financial Crimes Enforcement Network ("FinCEN") in this Action. ^{**} |
| Exhibit 80 | July 16, 2008, email and attachment, Bates JPM-SDNYLIT-00269718-00269719 , produced by JPMorgan in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 81 | Document at Bates JPM-SDNYLIT-W-00021932-00021937 , produced by JPMorgan in this Action, and previously marked as McCleerey Exhibit 13 at deposition. Designated Confidential pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 82 | Document at Bates JPM-SDNYLIT-W-00021965-0021966 , produced by JPMorgan in this Action, and previously marked as Ryan Exhibit 23 at Deposition. JPMorgan initially designated this document Confidential pursuant |

^{**}The Government is producing an index rather than attaching the currency transaction reports because they are voluminous (nearly 700 pages). The Government's SUF includes tables summarizing relevant information from the currency transaction reports. The Government will provide these documents to the Court at its request.

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| | to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 83 | July 19, 2013, email, Bates JPM-SDNYLIT-00100966 , produced by JPMorgan in this Action, and previously marked as Erdoes Exhibit 30 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 84 | January 7, 2011, Rapid Response Team memo, Bates JPM-SDNYLIT-00127930-00127932 , produced by JPMorgan in this Action, and previously marked as Erdoes Exhibit 24 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 85 | Document at Bates JPM-SDNYLIT-00230825-00230830 , produced by JPMorgan in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 86 | Document at Bates JPM-SDNYLIT-00036884-00036890 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 87 | Document at Bates JPM-SDNYLIT-W-00019086-00019096 , produced by JPMorgan in this Action, and previously marked as McCleerey Exhibit 33 at deposition. Designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 88 | Transcript excerpts of Deposition of former CEO of Private Bank John Duffy , taken July 13, 2023, in this Action. Designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 89 | Document at Bates JPM-SDNYLIT-00006049-00006050 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 90 | November 9, 2010, email, Bates JPM-SDNYLIT-00010814-0001080815 , produced by JPMorgan in this Action, and previously marked as Casey Exhibit 37 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |

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| Exhibit 91 | July 26, 2006, email, Bates JPM-SDNYLIT-00099335 , produced by JPMorgan in this Action, and <i>Palm Beach Post</i> article by Larry Keller, <i>After long probe, Palm Beach billionaire faces solicitation charge</i> , published July 26, 2006, at http://www.palmbeachpost.com/pbccentral/content/local_new/epaper/2006/07/26/slb_EPSTEIN_0726.html , accessed March 15, 2023 through https://web.archive.org/web/20060929041447 , together previously marked as Casey Exhibit 5 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 92 | September 20, 2007, emails, Bates JPM-SDNYLIT-000099500, JPM-SDNYLIT-000099501, JPM-SDNYLIT-00390951, JPM-SDNYLIT-00390952 , produced by JPMorgan in this Action, and previously marked as Staley Exhibit 14. JPMorgan initially designated these documents Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the documents are filed under seal in part. [Sealed in part] |
| Exhibit 93 | June 17, 2013, email and attachment, Bates JPM-SDNYLIT-00194342-00194344 , produced by JPMorgan in this Action, and previously marked as DeLuca Exhibit 23 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 94 | Jeffrey Epstein's 2007 Non-Prosecution Agreement, Bates JDoe_JPMC_003010-003023 , produced by Plaintiff Jane Doe in this Action, and previously marked as Erdoes Exhibit 39 in deposition. |
| Exhibit 95 | Oct. 10, 2007, email and attachment, Bates JPM-SDNYLIT-00099526-00099528 , produced by JPMorgan in this Action, and previously marked as McCleerey Exhibit 6 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 96 | July 1, 2008, email and attachment, Bates JPM-SDNYLIT-00002952-00002955 , produced by JPMorgan in this Action, and previously marked as Erdoes Exhibit 17 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 97 | July 15, 2008, email and multiple attachments, Bates JPM-SDNYLIT-00003026-00003035 , produced by JPMorgan in this Action, and previously |

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| | marked as Casey Exhibit 27 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 98 | Sept. 9, 2010, email, Bates JPM-SDNYLIT-00229703 , produced by JPMorgan in this Action, and previously marked as Cutler Exhibit 9 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 99 | Transcript excerpts of the Deposition of former General Counsel Stephen Cutler , taken May 24, 2023, in this Action. Designated Confidential in part by JPMorgan pursuant to the Protective Order in this matter and filed under seal in part. [Sealed in part] |
| Exhibit 100 | March 16, 2011, email, Bates JPM-SDNYLIT-00274527-00274531 , produced by JPMorgan in this Action, and previously marked as Cutler Exhibit 29 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 101 | Oct. 6, 2007, article, Bates JPM-SDNYLIT-00036593 , produced by JPMorgan in this Action, and previously marked as Casey Exhibit 24 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 102 | Oct. 26, 2007, email, Bates JPM-SDNYLIT-00001962-00001965 , produced by JPMorgan in this Action, and previously marked as Casey Exhibit 23 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 103 | Document at Bates JPM-SDNYLIT-00002155 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 104 | July 31, 2010, email, Bates JPM-SDNYLIT-00100251 , produced by JPMorgan in this Action, and previously marked as Erdoes Exhibit 23 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 105 | Document at Bates JPM-SDNYLIT-00011902 , produced by JPMorgan in this Action, designated confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 106 | August 4, 2010, article, Bates JPM-SDNYLIT-00036596-00036598 , produced by JPMorgan in this Action, and previously marked as Casey Exhibit 13 at deposition. JPMorgan initially designated this document Confidential pursuant |

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| | to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 107 | March 7, 2011, email and attachment, Bates JPM-SDNYLIT-00013499-00013500 , produced by JPMorgan in this Action, and previously marked as Erdoes Exhibit 26 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 108 | Document at Bates JPM-SDNYLIT-00751685 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 109 | Document at Bates JPM-SDNYLIT-00751686 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 110 | Article by Dareh Gregorian, <i>Second Girl Sues Mogul</i> , New York Post (February 7, 2008), https://nypost.com/2008/02/07/second-girl-sues-mogul/ (accessed July 11, 2023). |
| Exhibit 111 | Intentionally left blank. |
| Exhibit 112 | Due Diligence Report, Bates JPM-SDNYLIT-00036258-00036263 , produced by JPMorgan in this Action, and previously marked as Pearn Exhibit 17 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 113 | October 22 – December 21, 2010, email thread, Bates JPM-SDNYLIT-00194018-00194021 , produced by JPMorgan in this Action, and previously marked as DeLuca Exhibit 7 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 114 | December 22, 2010, email, Bates JPM-SDNYLIT-00152738-00152742 , produced by JPMorgan, and previously marked as DeLuca Exhibit 8 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 115 | December 23, 2010, email, Bates JPM-SDNYLIT-00204777 , produced by JPMorgan in this Action, and previously marked as DeLuca Exhibit 10 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation while retaining its original redactions to the document. |

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| Exhibit 116 | January 4, 2011, email, Bates JPM-SDNYLIT-00011967-00011968 , produced by JPMorgan in this Action, and previously marked as Casey Exhibit 40 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 117 | January 6, 2011, email, JPM-SDNYLIT-00194062-00194063 , produced by JPMorgan in this Action, and previously marked as Ryan Exhibit 6 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 118 | January 10, 2011, email and attachments, JPM-SDNYLIT-00157065_R-00157082 , produced by JPMorgan in this Action, and previously marked as Ryan Exhibit 8 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 119 | Transcript excerpts of the Deposition of former head of Compliance at JPMorgan, William Langford , taken on May 3, 2023, in this Action. JPMorgan has withdrawn its designation of Confidential for the testimony contained in these excerpts. |
| Exhibit 120 | Transcript excerpts of the Deposition of the Former Managing Director, Global FIU Investigations, Phillip DeLuca , taken on April 19, 2023, in this Action. JPMorgan has withdrawn its designation of Confidential for the testimony contained in these excerpts. |
| Exhibit 121 | March 12, 2013, email, Bates JPM-SDLIT-00194272-00194273 , produced by JPMorgan in this Action, and previously marked as DeLuca Exhibit 22 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 122 | "Bear Stearns Collapses, Sold to J.P. Morgan Chase," available: https://www.history.com/this-day-in-history/bear-stearns-sold-to-j-p-morgan-chase , accessed June 23, 2023. |
| Exhibit 123 | Transcript excerpts of the Deposition of CEO of Asset Wealth Management, Mary Erdoes , taken March 15, 2023, in this Action, designated confidential in part by JPMorgan pursuant to the Protective Order in this matter and filed under seal in part. [Sealed in part] . |
| Exhibit 124 | Due Diligence Report, Bates JPM-SDNYLIT-00037171-00037177 , produced by JPMorgan in this Action, and previously marked as Casey Exhibit 34 at deposition. JPMorgan initially designated this document Confidential pursuant |

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| | to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 125 | Document at Bates JPM-SDNYLIT-00373074-00373076 , produced by JPMorgan in this Action, designated confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 126 | Arthur Middlemiss LinkedIn Profile, https://www.linkedin.com/in/arthur-middlemiss-341a6b11/ . |
| Exhibit 127 | January 10, 2011, email, JPM-SDNYLIT-00157192-00157193 , produced by JPMorgan in this Action, and previously marked as Langford Exhibit 37 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation while retaining its original redactions to the document. |
| Exhibit 128 | Document at Bates JPM-SDNYLIT-00373247 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 129 | Document at Bates JPM-SDNYLIT-00373248-00373252 , produced by JPMorgan in this Action, designated confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 130 | Aug. 27, 2006, email, Bates JPM-SDNYLIT-00099337 , produced by JPMorgan in this Action, and previously marked as Erdoes Exhibit 10 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 131 | Document at Bates JPM-SDNYLIT-00106627 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 132 | Article, <i>The Truth About Jeffrey Epstein and 'Vanity Fair,'</i> posted by Chaire, http://www.gawker.com/302773/the-truth-about-jeffrey-epstein-and-vanity-fair , accessed June 27, 2023. |
| Exhibit 133 | May 28, 2008, email, Bates JPM-SDNYLIT-00134475 , produced by JPMorgan in this Action, and previously marked as Erdoes Exhibit 44 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 134 | Article by John M. Cunningham, <i>Miley Cyrus</i> , http://www.britanica.com/biography/Miley-Cyrus , accessed July 12, 2023. |

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| Exhibit 135 | February 9, 2011, email, Bates JPM-SDNYLIT-00453044 , produced by JPMorgan in this Action, and previously marked as Ryan Exhibit 13 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 136 | Article, <i>Law & Order Commemorates Jeffrey Epstein's Taste for Teen Hookers</i> , Gawker, https://www.gawker.com/5751094/law--order-commemorates-jeffrey-epsteins-taste-for-teen-hookers , accessed June 30, 2023. |
| Exhibit 137 | November 29, 2011, email, Bates JPM-SDNYLIT-00100689 , produced by JPMorgan in this Action, and previously marked as DeLuca Exhibit 20 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 138 | June 17, 2013, email, Bates JPM-SDNYLIT-00100935-00100936 , produced by JPMorgan in this Action, and previously marked as Erdoes Exhibit 29 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 139 | September 13, 2012, email, Bates JPM-SDNYLIT-00755203 , produced by JPMorgan in this Action, and previously marked as Staley Exhibit 19 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 140 | July 10, 2010, email, Bates JPM-SDNYLIT-00008669-00008670 , produced by JPMorgan in this Action, and marked as Staley Exhibit 35 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 141 | January 23, 2008, email, Bates JPM-SDNYLIT-00006171 , produced by JPMorgan in this Action, and previously marked as Dimon Exhibit 11 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 142 | September 1, 2009, email, Bates ESTATE_JPM002773 , produced by nonparty The Estate of Jeffrey E. Epstein in this Action, and previously marked as Staley Exhibit 36 at Deposition. The Estate initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 143 | December 20, 2009, email and attachment, Bates JPM-SDNYLIT-00006791-00006792 , produced by JPMorgan in this Action, and previously marked as Staley Exhibit 37 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn |

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| | the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 144 | Document at Bates JPM-SDNYLIT-00901998-00902019 , produced by JPMorgan in this Action, and marked Staley Exhibit 21 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 145 | December 5, 2009, email and attachment, Bates JPM-SDNYLIT-00006715-00006716 , produced by JPMorgan in this Action, and marked as Staley Exhibit 38 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 146 | Document at Bates JPM-SDNYLIT-00006718-00006719 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 147 | Department of Financial Services announcement: "Superintendent Lacewell Announces DFS Imposes \$150 Million Penalty on Deutsche Bank in Connection with Bank's Relationship with Jeffrey Epstein and Correspondent Relationships with Danke Estonia and FBME Bank." Previously marked as Cutler Exhibit 39 at deposition. |
| Exhibit 148 | Consent Order, <i>In the Matter of Deutsche Bank AG, et al.</i> , New York State Department of Financial Services, signed July 6, 2020. Previously marked as Cutler Exhibit 40 at deposition. |
| Exhibit 149 | Excerpt of document at Bates JPM-SDNYLIT-00921097 , produced in Excel format by JPMorgan in the Action. This excerpt was created to show relevant rows and columns by filtering for specific "Beneficiary_Normalized" entries and by hiding multiple columns. Designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 150 | Bank statement for account ending in 6312, Bates JPM-SDNYLIT-00085024-00085031 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 151 | Bank statement for account ending in 4324, Bates JPM-SDNYLIT-00076877-00076880 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |

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| Exhibit 152 | Index of account statements for Epstein's JPMorgan account ending in 0663, produced by JPMorgan in this Action.* |
| Exhibit 153 | Index of account statements for The C.O.U.Q. Foundation's JPMorgan account ending in 1565, produced by JPMorgan in this Action.* |
| Exhibit 154 | Compilation of wire instructions, Bates JPM-SDNYLIT-00095431-95432; JPM-SDNYLIT-00095431-95432; JPM-SDNYLIT-00095471; JPM-SDNYLIT-00095709; JPM-SDNYLIT-00096355; JPM-SDNYLIT-00097240; JPM-SDNYLIT-00097437-97438; JPM-SDNYLIT-00097820-97821 , produced by JPMorgan in this Action. Designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 155 | Account statement summary for account ending in 4810, Bates JPM-SDNYLIT-00091214 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 156 | Documents related to Epstein's 2012 gift tax return, Bates MP-00000778-00000832832 , produced by nonparty Marks Paneth in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 157 | November 20, 2012, Private Bank Client Cash Transaction Guidelines, Bates JPM-SDNYLIT-00130224-00130226 , produced by JPMorgan in this Action, and previously marked as Casey Exhibit 32 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 158 | Excerpt of document, Bates JPM-SDNYLIT-W-00017133 – W-00017134, JPM-SDNYLIT-W-00017206 – W-00017210 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 159 | Document at Bates JPM-SDNYLIT-W-00000001-00000002, JPM-SDNYLIT –W-00000175-00000182 (excerpts) , produced by JPMorgan in this Action, previously marked as Dimon Exhibit 132 at deposition. Designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 160 | Transcript excerpts of the Deposition of former Private Banker Paul Morris taken April 18, 2023, in this Action. Designated Confidential in part by JPMorgan pursuant to the Protective Order in this matter and filed under seal in part. [Sealed in part] |

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| Exhibit 161 | Document, "Wealth Management Top 25 Investor Clients," Bates JPM-SDNYLIT-00133088 , produced in Excel format by JPMorgan in this Action, and previously marked as Staley Exhibit 3 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 162 | October 2, 2006, email, Bates JPM-SDNYLIT-00001091-00001099 , produced by JPMorgan in this Action, and previously marked as Erdoes Exhibit 5 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 163 | April 20, 2004, email, Bates JPM-SDNYLIT-00105030 , produced by JPMorgan in this Action, and previously marked as Casey Exhibit 9 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 164 | February 24, 2005, email, Bates JPM-SDNYLIT-00448615-00448616 , produced by JPMorgan in this Action, and previously marked as Staley Exhibit 5 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 165 | July 15, 2008, Rapid Response Team memorandum, Bates JPM-SDNYLIT-00127944 , produced by JPMorgan in this Action, and previously marked as Erdoes Exhibit 18 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 166 | Document at Bates JPM-SDNYLIT-00003755-00003758 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 167 | Document at Bates JPM-SDNYLIT-00011654-00011655 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 168 | Document at Bates JPM-SDNYLIT-00754975-00754979 , produced by JPMorgan in this Action, and previously marked Staley Exhibit 4 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |

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| Exhibit 169. | July 3, 2013, email, Bates JPM-SDNYLIT-00029230 , produced by JPMorgan in this Action, and previously marked as Nelson Exhibit 7 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 170 | Document at Bates JPM-SDNYLIT-00394015-00394017 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 171 | Transcript excerpts of the Deposition of Justin Nelson , taken April 21, 2023, in this Action. JPMorgan has withdrawn its designation of Confidential for the testimony contained in these excerpts. |
| Exhibit 172 | Third-Party Defendant James E. Staley's Responses and Objections to the Government of the United States Virgin Islands' First Set of Interrogatories, dated April 20, 2023. |
| Exhibit 173 | January 23, 2008, email, Bates JPM-SDNYLIT-00002152 , produced by JPMorgan in this Action, and previously marked as Dimon Exhibit 113 at deposition. JPMorgan initially designated this document as Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 174 | June 5, 2009, email, Bates JPM-SDNYLIT-00005959 , produced by JPMorgan in this Action. Designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 175 | Excerpt of document at Bates JPM-SDNYLIT-00907707 , produced in Excel format produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this Matter and filed under seal. [Sealed] |
| Exhibit 176 | June 18, 2009, email, Bates JPM-SDNYLIT-00006005 , produced by JPMorgan in this Action, and previously marked as Dimon Exhibit 101 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 177 | Document at Bates JPM-SDNYLIT-00004763 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 178 | Document at Bates JPM-SDNYLIT-00007534-00007535 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |

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| Exhibit 179 | Document at Bates JPM-SDNYLIT-00007970 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 180 | Document at Bates JPM-SDNYLIT-00009703 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 181 | December 2, 2010, email, Bates ESTATE_006071 , produced by nonparty The Estate of Jeffrey E. Epstein. The Estate initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 182 | Document at Bates JPM-SDNYLIT-00011808 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 183 | November 23, 2013, email, Bates JPM-SDNYLIT-00153462-00153463 , produced by JPMorgan in this Action, and previously marked as Staley Exhibit 13 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 184 | Document at Bates JPM-SDNYLIT-00102986 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 185 | Document at Bates JPM-SDNYLIT-00102892-00102893 , produced by JPMorgan in this Action, and previously marked Casey Exhibit 10 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 186 | Document at Bates JPM-SDNYLIT-00000184_R-00000186_R , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 187 | Document at Bates JPM-SDNYLIT-00099558-00099560 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 188 | Documents at Bates SB-0001-0006 , produced by nonparty Sergey Brin in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. [Sealed] |

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| Exhibit 189 | Documents at Bates AUBURN-001-AUBURN-024 , produced by nonparty Larry Page in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. [Sealed] . |
| Exhibit 190 | July 23, 2014, KYC Summary, Bates JPM-SDNYLIT-00902708-00902714 , produced by JPMorgan in this Action, and previously marked as Staley Exhibit 10 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 191 | Document at Bates JPM-SDNYLIT-00449185 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 192 | Document at Bates JPM-SDNYLIT-00390515 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 193 | Document at Bates JPM-SDNYLIT-00390516 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 194 | Document at Bates JPM-SDNYLIT-00390517 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 195 | Document at Bates JPM-SDNYLIT-00390519 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 196 | October 26, 2006, email, Bates JPM-SDNYLIT-00099356 , produced by JPMorgan in this Action, and previously marked as Staley Exhibit 9 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 197 | Document at Bates JPM-SDNYLIT-00390520-00390521 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 198 | Document at Bates JPM-SDNYLIT-00390522-00390523 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 199 | Document at Bates JPM-SDNYLIT-00390590-00390591 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |

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| Exhibit 200 | Document at Bates JPM-SDNYLIT-00099423 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 201 | Document at Bates JPM-SDNYLIT-00134152 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 202 | Document at Bates JPM-SDNYLIT-00449668 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 203 | Document at Bates JPM-SDNYLIT-00449669-00449672 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 204 | Document at Bates JPM-SDNYLIT-00390671 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 205 | January 31, 2007, email, Bates JPM-SDNYLIT-00390720 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 206 | Document at Bates JPM-SDNYLIT-00449037-00449038 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 207 | Mahmoud Difrawy LinkedIn Profile, available at: https://www.linkedin.com/in/mahmoud-difrawy-41889529/?originalSubdomain=uk . |
| Exhibit 208 | Document at Bates JPM-SDNYLIT-00006724-00006725 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 209 | December 8, 2009, email, Bates ESTATE_JPM002897 , produced by nonparty The Estate of Jeffrey E. Epstein in this Action. The Estate initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 210 | Document at Bates JPM-SDNYLIT-00006727 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |

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| Exhibit 211 | Document at Bates JPM-SDNYLIT-00006729 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 212 | August 15, 2013, email, Bates JPM-SDNYLIT-00101010-00101011 , produced by JPMorgan in this Action, and previously marked as Erdoes Exhibit 49 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 213 | July 10, 2012, email, Bates JPM-SDNYLIT-00022569 , produced by JPMorgan in this Action, and previously marked as Erdoes Exhibit 31 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 214 | Document at Bates JPM-SDNYLIT-00393112 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 215 | Document at Bates JPM-SDNYLIT-00028892-00028893 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 216 | Document at Bates JPM-SDNYLIT-00029911-00029913 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 217 | Document at Bates Apollo_VI_00000423 , produced by nonparty Apollo Global Management, Inc. in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 218 | Document at Bates Apollo_VI_00000646 , produced by nonparty Apollo Global Management, Inc. in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 219 | March 23, 2011, email, Bates JPM-SDNYLIT-00013841 , produced by JPMorgan in this Action, and previously marked as Staley Exhibit 12 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 220 | Document at Bates JPM-SDNYLIT-00014260 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |

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| Exhibit 221 | Document at Bates JPM-SDNYLIT-00017368 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 222 | Excerpt of JPMorgan Chase Bank, N.A.'s Responses and Objections to Third-Party Defendant's First Set of Interrogatories, dated May 18, 2023. Designated Confidential by JPMorgan pursuant to the Protective Order in this Matter and filed under seal. [Sealed] |
| Exhibit 223 | Document at Bates JPM-SDNYLIT-00032344-00032346 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 224 | Document at Bates JPM-SDNYLIT-00032434-00032435 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 225 | September 30, 2014, email, Bates JPM-SDNYLIT-00032511-00032516 , produced by JPMorgan in this Action, and previously marked as Nelson Exhibit 6 at deposition. JPMorgan initially designated this document Confidential, pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 226 | April 21, 2023, email, Bates JPM-SDNYLIT-00032218-00032220 , produced by JPMorgan in this Action, and previously marked as Nelson Exhibit 5 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 227 | Excerpt of JPMorgan Chase Bank, N.A.'s First Supplemental Responses and Objections to Interrogatories in Lieu of Rule 30(b)(6) Deposition Testimony, dated April 14, 2023. JPMorgan has designated portions of the document Confidential pursuant to the Protective Order in this matter and the document is filed under seal in part. |
| Exhibit 228 | Document at Bates JPM-SDNYLIT-00030644-00030645 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 229 | Document at Bates JPM-SDNYLIT-00031300 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 230 | Document at Bates JPM-SDNYLIT-00394592-00394593 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |

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| Exhibit 231 | Document at Bates JPM-SDNYLIT-00032975-00032976 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 232 | Document at Bates JPM-SDNYLIT-00033177-00033179 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 233 | Document at Bates JPM-SDNYLIT-00034618 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 234 | JPMorgan Chase Bank, N.A.'s Supplemental Responses and Objections to Doe Plaintiff's First Set of Interrogatories, dated April 11, 2023. |
| Exhibit 235 | Document at Bates JPM-SDNYLIT-00233394 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 236 | Document at Bates JPM-SDNYLIT-00233392 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 237 | Document at Bates JPM-SDNYLIT-00791467 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 238 | Document at Bates JPM-SDNYLIT-00448060-00448065 , produced by JPMorgan in this Action, and previously marked as Dimon Exhibit 107 at deposition. Designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 239 | January 3, 2010, document, Bates ESTATE_JPM010125-010128 , produced by nonparty The Estate of Jeffrey E. Epstein in this Action. The Estate initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 240 | Document at Bates JPM-SDNYLIT-00154163-00165164 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 241 | February 15, 2005, email, Bates JPM-SDNYLIT-00448590-00448591 , produced by JPMorgan in this Action, and previously marked as Staley Exhibit 1 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the |

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| | designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 242 | June 16, 2004, email and attachments, Bates JPM-SDNYLIT-00448149-00448196 , produced by JPMorgan in this Action, and previously marked as Staley Exhibit 2 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 243 | Article by Andrew Ross Sorkin and Landon Thomas Jr., <i>J.P. Morgan Chase to Acquire Bank One in \$58 Billion Deal</i> , New York Times (January 14, 2004), https://www.nytimes.com/2004/01/14/business/jp-morgan-chase-to-acquire-bank-one-in-58-billion-deal.html . |
| Exhibit 244 | Document at Bates JPM-SDNYLIT-00724984-00725000 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 245 | Document at Bates JPM-SDNYLIT-00448780 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 246 | Document at Bates JPM-SDNYLIT-00016246-00016256 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 247 | Article by Reuters, <i>J.P. Morgan to Buy Control of Hedge Fund</i> , The New York Times (Sept. 28, 2004), https://www.nytimes.com/2004/09/28/business/jp-morgan-to-buy-control-of-hedge-fund.html , accessed July 20, 2023. |
| Exhibit 248 | Article, <i>Purchase of Highbridge Capital Management</i> , J.P. Morgan (June 11, 2009), https://web.archive.org/web/20120426055706/https://careers.jpmorganchase.com/cm . Previously marked as Staley Exhibit 17 at deposition. |
| Exhibit 249 | Document at Bates JPM-SDNYLIT-00004787-00004789 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 250 | August 8, 2006, email, Bates JPM-SDNYLIT-00000254-00000255 , produced by JPMorgan in this Action, and previously marked as Casey Exhibit 8 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |

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| Exhibit 251 | Document at Bates JPM-SDNYLIT-00026223 , produced by JPMorgan in this Action, and previously marked as Third-Party Exhibit 109 at the deposition of John Duffy. Designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 252 | Excerpt of “JPMC- Cumulative Privilege Log” (May 9, 2023), produced in Excel format by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protect Order in this matter and filed under seal. [Sealed] |
| Exhibit 253 | Verified Complaint, <i>Financial Trust Company, Inc. v. The Bear Stearns Companies Inc.</i> , 3:09-cv-00106-CVG-GWB (D.V.I. Div. St. Thomas & St. John, Aug. 5, 2009) |
| Exhibit 254 | July 20, 2011, email, Bates JPM-SDNYLIT-00274561 , produced by JPMorgan in this Action, and previously marked as Cutler Exhibit 21 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation while retaining its original redactions to the document. |
| Exhibit 255 | July 22, 2011, email, Bates JPM-SDNYLIT-00135958_R-00135958_R , produced by JPMorgan in this Action, and previously marked as Cutler Exhibit 22 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 256 | Document at Bates JPM-SDNYLIT-00269848 , produced in Excel format by JPMorgan in this Action, and previously marked as Langford Exhibit 45 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 257 | April 8, 2011, email and attachment, Bates JPM-SDNYLIT-00230025-00230028 , produced by JPMorgan in this Action, and previously marked as McCleerey Exhibit 25 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 258 | July 22, 2011, email, Bates JPM-SDNYLIT-00754982-0075984 , produced by JPMorgan in this Action, and previously marked as Cutler Exhibit 23 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |

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| Exhibit 259 | 7/26/2011, email, Bates JPM-SDNYLIT-00136106 , produced by JPMorgan in this Action, produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 260 | March 29, 2011, email, Bates JPM-SDNYLIT-00731610 , produced by JPMorgan in this Action, and previously marked as Cutler Exhibit 30 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 261 | Document at Bates JPM-SDNYLIT-00790948_R-00790950_R , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 262 | Document at Bates JPM-SDNYLIT-00892560-00892561 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 263 | August 16, 2010, email, Bates JPM-SDNYLIT-00752910-000752912 , produced by JPMorgan in this Action, and previously marked as Cutler Exhibit 20 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation while retaining its original redactions to the document. |
| Exhibit 264 | February 6, 2011, email, Bates ESTATE_JPM-001591 , produced by nonparty The Estate of Jeffrey E. Epstein in this Action. The Estate initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation. |
| Exhibit 265 | Document at Bates JPM-SDNYLIT-00016652-00016654 , produced by JPMorgan in this Action. Designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 266 | Document at Bates JPM-SDNYLIT-00016924 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 267 | Document at Bates GF000664-000670 , produced by nonparty Bill & Melinda Gates Foundation in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 268 | Document at Bates GV000028 , produced by nonparty Gates Ventures in this Action, designated Confidential pursuant to the Protective Order in this matter and filed under seal. [Sealed] |

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| Exhibit 269 | Document at Bates JPM-SDNYLIT-00133931-00133932 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 270 | Document at Bates JPM-SDNYLIT-00005844 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 271 | Document at Bates JPM-SDNYLIT-00010121-00010122 , produced by JPMorgan in this Action, designated confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 272 | December 12, 2008, email, Bates JPM-SDNYLIT-00099627 , produced by JPMorgan in this Action, and previously marked as Erdoes Exhibit 41 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 273 | Full Transcript: <i>CNN Anchor Poppy Harlow's exclusive interview with JPMorgan Chase Chairman and CEO Jamie Dimon</i> , CNN (April 7, 2023), cnnpressroom.blogs.cnn.com/2023/04/07/full-transcript-cnn-anchor-poppy-harlows-exclusive-interview-with-jpmorgan-chase-chairman-and-ceo-jamie-dimon . Previously marked as Cutler Exhibit 3 at deposition. |
| Exhibit 274 | Excerpt of Expert Report of Shaun O'Neill, CPA, CFF, CFE, dated May 16, 2023. Designated Confidential pursuant to the Protective Order in this matter and filed under seal. |
| Exhibit 275 | Due Diligence Report, Bates JPM-SDNYLIT-00149678-00149683 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 276 | March 1, 2011, email, Bates JPM-SDNYLIT-00100422-00100423 , produced by JPMorgan in this Action, designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 277 | Article by Constant Méheut, <i>Epstein Associate Is Charged with Rape of Minors in France</i> , New York Times (December 19, 2020), https://www.nytimes.com/2020/12/19/world/europe/france-epstein-brunel.html (accessed July 20, 2023). |
| Exhibit 278 | Transcript excerpts of the Deposition of former U.S. Virgin Islands Attorney General Vincent Frazer , taken on July 13, 2023, in this Action. |

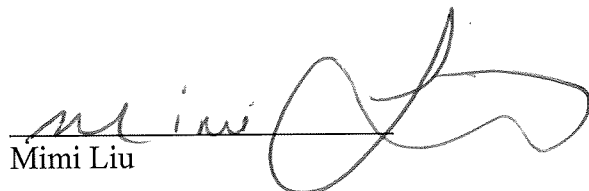
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| Exhibit 279 | 2012 correspondence between Hodge & Francois and the Office of the Attorney General of the Virgin Islands at Bates VI-JPM-000012484 – 0000125491 . This is an excerpt of Bates VI-JPM-000012328-000012522 , produced by Plaintiff Government of the United States Virgin Islands in this Action, and previously marked as Frazer Exhibit 18 at deposition. |
| Exhibit 280 | Transcript excerpts of the 30(b)(6) Deposition of U.S. Virgin Islands Department of Justice Sexual Offender Registry Coordinator Shani Pinney , taken on July 18, 2023, in this Action. |
| Exhibit 281 | 2012 correspondence between Hodge & Francois or Darren Indyke and the Office of the Attorney General of the Virgin Islands at Bates VI-JPM-000012246-000012250, VI-JPM-000012263-000012265, and VI-JPM-000012268-000012272 . These are excerpts of Bates VI-JPM-000012328-000012522 , produced by Plaintiff Government of the United States Virgin Islands in this Action, and previously marked as Frazer Exhibit 4 at deposition. |
| Exhibit 282 | Transcript excerpts of the Deposition of former U.S. Virgin Islands Attorney General Denise George , taken on July 17, 2023, in this Action. |
| Exhibit 283 | Transcript excerpts of the Deposition of U.S. Virgin Islands Board of Education Interim Executive Director and former Economic Development Authority Compliance Officer U.S. Sandra Bess , taken on May 17, 2023, in this Action. |
| Exhibit 284 | Industrial Development Certificate for Financial Trust Company, Inc., March 22, 1999, Bates VI-JPM-000017992-000018004 , produced by Plaintiff Government of the United States Virgin Islands in this Action, and previously marked as Bess Exhibit 1 at deposition. |
| Exhibit 285 | Industrial Development Certificate (Extension) for Financial Trust Company, Inc., effective January 1, 2012, Bates VI-JPM-000017983-000017991 , produced by Plaintiff Government of the United States Virgin Islands in this Action, and previously marked as Bess Exhibit 2 at deposition. |
| Exhibit 286 | Industrial Development Certificate for Financial Trust Company, Inc., October 25, 2012, Bates VI-JPM-000018005-000018014 , produced by Plaintiff Government of the United States Virgin Islands in this Action, and previously marked as Bess Exhibit 3 at deposition. |
| Exhibit 287 | Transcript excerpts of the 30(b)(6) Deposition of U.S. Virgin Islands Economic Development Authority Managing Director Margarita Benjamin , taken on May 26, 2023, in this Action. |

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| Exhibit 288 | Outline, "Jeffrey Epstein's EDC Companies," with handwritten notes, Bates VI-JPM-000019063 –000019067 , produced by Plaintiff Government of the United States Virgin Islands in this Action, and previously marked as Benjamin Exhibit 1 at deposition. |
| Exhibit 289 | Outline, "Jeffrey Epstein's EDC Companies," Bates VI-JPM-000019063 – 000019067 , produced by Plaintiff Government of the United States Virgin Islands in this Action, and previously marked as Benjamin Exhibit 12 at deposition. |
| Exhibit 290 | Transcript of Public Hearing of the Economic Development Commission held November 15, 2012, Bates VI-JPM-000016206-000016247 , produced by Plaintiff Government of the United States Virgin Islands in this Action, and previously marked as Benjamin Exhibit 19 at deposition. |
| Exhibit 291 | Transcript excerpts of the Deposition of U.S. Virgin Islands Governor Albert Bryan , taken on June 6, 2023, in this Action. |
| Exhibit 292 | Excerpt of transcript of Public Hearing of the Economic Development Commission held February 12, 2009, Bates VI-JPM-000016200-000016205 , produced by Plaintiff Government of the United States Virgin Islands in this Action, and previously marked as Bryan Exhibit 1 at deposition. |
| Exhibit 293 | Letter dated January 7, 2015, from Stephanie Berry to Jeffrey Epstein regarding Southern Trust Company, Bates Estate_JPM018432 , produced by nonparty The Estate of Jeffrey E. Epstein in this Action, and previously marked as Benjamin Exhibit 32 at deposition. Designated Confidential pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 294 | Letter dated January 8, 2014, from Erika Kellerhals to Stephanie Berry regarding Southern Trust Company, Inc., Bates VI-JPM-000040186 , produced by Plaintiff Government of the United States Virgin Islands in this Action. |
| Exhibit 295 | Transcript excerpts of Deposition of U.S. Virgin Islands Congresswoman and former Economic Development Authority Counsel Stacey Plaskett , taken on May 9, 2023, in this Action. Designated confidential in part by Representative Plasket pursuant to the Protective Order in this matter and filed under seal in part. |
| Exhibit 296 | Excerpt of transcript of Public Hearing of the Economic Development Commission held February 12, 2009, Bates VI-JPM-000016200-000016205 , produced by Plaintiff Government of the United States Virgin Islands in this Action, and previously marked as Plaskett Exhibit 2 at deposition. |

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| Exhibit 297 | Transcript excerpts of Deposition of former Financial Trust Company and Southern Trust Company Office Manager Cecile de Jongh , taken on May 29, 2023, in this Action. |
| Exhibit 298 | Transcript excerpts of the 30(b)(6) Deposition of U.S. Virgin Islands Economic Development Authority Managing Director Margarita Benjamin , taken on July 14, 2023, in this Action. |
| Exhibit 299 | Transcript excerpts of Deposition of U.S. Virgin Islands Superior Court Judge and former Acting Attorney General Carol Thomas-Jacobs , taken on July 13, 2023, in this Action. |
| Exhibit 300 | May 13-15, 2013, email thread regarding Quick response re: TOEFL, Bates ESTATE_JPM024114-024118 , produced by nonparty The Estate of Jeffrey E. Epstein in this Action, and previously marked as C. de Jongh Exhibit 25 at deposition Designated Confidential pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 301 | August 28, 2008, email, Bates JPM-SDNYLIT-00003706_R , produced by JPMorgan in this Action, and previously marked as Casey Exhibit 29 at deposition. JPMorgan initially designated this document Confidential pursuant to the Protective Order in this matter but has withdrawn the designation in part and the document is filed under seal in part. [Sealed in part] |
| Exhibit 302 | July 10-11, 2011, emails and attachment, Bates JPM-SDNYLIT-00110055-00110056 and JPM-SDNYLIT-00100548-00100549 , produced by JPMorgan in this Action, and previously marked as Third-Party Exhibit 85 at the July 12, 2023, deposition of Mary Erdoes. Designated Confidential by JPMorgan pursuant to the Protective Order in this matter and filed under seal. [Sealed] |
| Exhibit 303 | Photograph, previously marked as Third-Party Exhibit 85B at the July 12, 2023, deposition of Mary Erdoes. Designated Confidential pursuant to the Protective Order in this matter and filed under seal. [Sealed] |

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 24, 2023


Mimi Liu